

**FEDERAL BUREAU OF INVESTIGATION**

**REGULATORY INSPECTION REPORT  
(18 USC 2257)**

**OF**

**Moonlight Entertainment  
8536 Oso Ave.  
Winnetka, CA 91306**

**Date of Inspection: 05/03/2007**

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## REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,  
2257 Regulatory Inspections Program, Crimes Against Children Unit,  
Violent Crimes Section, Criminal Investigative Division

Report Date: May 8, 2007

File Number: (F) Moonlight

### PRODUCER INFORMATION

An inspection was conducted of Moonlight Entertainment pursuant to 18 USC 2257 and 28 Code of Federal Regulations Part 75. The inspection was conducted at the residence of [REDACTED] (aka [REDACTED]) the former owner of Moonlight Entertainment. Per California State records, Moonlight Entertainment officially went out of business in 2003. The 2257 records were maintained in file cabinets located in the garage of Miller's residence.

### INSPECTION SUMMARY

DVDs produced by Moonlight Entertainment were ordered from the internet. Contract inspectors reviewed four DVDs and identified all performers by stage name or by still photographs taken from the video. All videos reviewed contained the required 2257 information in the proper format. A total of 38 performers were identified as appearing in the four DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on record to ensure the identification was, in fact, of that performer.

After the inspection on May 3, 2007, it was determined Moonlight Entertainment had three 2257 violations. These were one illegible photo identification, photo identification with an illegible date of birth, and an incomplete cross reference system.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.

## FINDINGS

1. A limited cross reference system was in place at the time of the inspection. The cross reference system consisted of file folders maintained in alphabetical order by performer stage name. In each folder were copies of photo identification containing true name and date of birth, as well as medical records and model release forms. Records were not maintained as to identify all sexually explicit materials in which the performer appeared.

*28 CFR Part 75.3 – “Records required to be maintained under this part shall be categorized and retrievable to: All name(s) of each performer, including any alias, maiden name, nickname, stage name or professional name of the performer; and including the title, number, or similar identifier...”*

2. The photo identification for (P-1) appearing in “Cat Lickers #4,” was not identifiable.

*28 CFR Part 75.2 – “...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card.”*

3. The date of birth of (P-1) appearing in “Decadent Dreams,” was not legible on her photo identification.

*28 CFR Part 75.2 – “...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card.”*

### Producer Response to Findings:

1. As Moonlight Entertainment is no longer in business, and will no longer be required to keep records as of 2008 (i.e., five years after the date of official dissolution of business), it is not necessary to update the cross reference system.
2. Adequate photo identification was provided for (P-1)
3. Adequate photo identification was provided for (P-1)

## PRE-INSPECTION PROCEDURES

The following Pre-Inspection Procedures were followed:

1. Moonlight Entertainment was randomly selected from a data base of known producers of adult products using a computerized random selection program.
2. A sample of Moonlight Entertainment DVDs was ordered and the method of purchase was documented.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

## INSPECTION PROCEDURES

The following Inspection Procedures were followed:

1. Inspection began at approximately 9:30 a.m. Prior contact had been made with [REDACTED] by telephone, and this was the time he agreed to meet the inspectors at his residence.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection upon arriving at [REDACTED]'s residence.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. SSA Joyner provided [REDACTED] with a letter explaining the parameters of the inspection and that Moonlight Entertainment could be re-inspected at any time if violations were discovered.
5. Digital photographs were taken prior to the inspection of the front of the residence and the garage in which the 2257 records were stored. A disc containing a total of five photographs was placed in a 1A envelope and maintained with the case file.
6. The Inspectors departed [REDACTED]'s residence at approximately 11:15 a.m.
7. A digital photograph was taken of the file cabinets used to store 2257 information prior to the inspectors departing the residence.

# **RECORDS VERIFICATION SPREADSHEET**

MOONLIGHT

VIDEO	PROD. DATE	PERFORMER NAME	DOB	TRUE NAME
ANAL ARISTOCRATS	Sep-96			
ANAL ARISTOCRATS				
CAT LICKERS 4	Nov-96			
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
CAT LICKERS 4				
DECADENT DREAMS	Jan-97			
DECADENT DREAMS				

## MOONLIGHT

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SUBJECT TO PROTECTIVE ORDER

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# PHOTO LOG/PHOTOS

LENST - Normal - N  
Wide - W  
Macro - M  
Tele. - T

EXPOSURE 1/1000 sec.  
FILM : ASA Digital  
ROLL No. \_\_\_\_\_

LIGHT - Available - A  
Elec.Strobe - E  
Flashbulb - F

Photo No.	Lens	Light	SS	f - stop	Description	Photo Log Sketch		REMARKS
						Entertainment	5/3/2007	
1					Sheet - Moonlight			
2					Residence - Street across the street			
3					Garage where 225 records the second floor			
4					Cabinet - corner cabinet			
5					Cabinets - open inspection picture			
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SUBJECT TO PROTECTIVE ORDER

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## **INSPECTION COMPLIANCE DETERMINATION**

Moonlight Entertainment was determined not to be in compliance with 18 USC 2257 and 28 CFR 75. All violations were resolved to the inspectors' satisfaction prior to the submission of this report.